

Application Privacy Notice

(Short From Review Draft)

[First Page]

What Information We Collect

We collect five kinds of information to measure the broadband performance of your mobile broadband service.

- Location
 - **Mouseover text to display** When we measure your mobile broadband performance, we collect the cell tower that provides your mobile broadband service, and the GPS location where the measurements were made.
- Time of data collection
 - **Mouseover text to display** When we measure your mobile broadband performance, we record the time the measurements were performed. Some measurements function by recording a start and end time.
- Handset type and operating system version;
 - **Mouseover text to display** When the measurement application starts, we record the manufacturer and model of phone you are using, and the version of the Android operating system installed on your phone.
- Cellular performance and characteristics;
 - **Mouseover text to display** We collect information about your cellular phone performance, such as the strength or timing of the radio signal, and what 3G or 4G service you have with what carrier.
- Broadband performance to specific locations on the Internet
 - **Mouseover text to display** The software you install tests your mobile broadband upload and download rate, round trip latency, and packet loss measured to servers on research networks managed by M-Lab (URI: www.measurementlab.org) and Level 3, or other facilities managed by the FCC contractor, SamKnows.

You can find more detail in the technical summary [URI link to technical summary]

[Second Page]

Third Party Sharing

The information we collect about your broadband performance is anonymous. No unique or persistent identifier is associated with any data we collect from you.

[**Mouseover text:** In other FCC programs data is tagged with a random number assigned to an application or device. We do not identify the data we collect from you with anything that would directly identify your handset. Your data simply becomes part of the total anonymous pool of

data that we collect in the program. Because your data appears together with data collected from the huge number of other participants the risk of someone trying to identify is greatly reduced.]

It is however extremely helpful for consumers, the FCC, and others interested in understanding mobile broadband in the United States. For example, the information we collect may be shared within the FCC to support our development of broadband policy.

Before we share information with any third party, we make decisions about the release of any collection of data after working with academics and our contractor to analyze the collected data for privacy risks or concerns.

[**Mouseover text:** In addition to our own analysis, we work with academics skilled in the field of statistics and computer science to identify patterns that a third party might exploit in ways to limit your privacy in the raw information, for example by comparing the location information with other sources of information. If we identify concerns we may take steps to address concerns by coarsening the time or location information, or deleting some information outright.]

We will not share your name or contact information with the public, carriers or researchers, and only in response to lawful requests from law enforcement.

We share different kinds of information with the public, researchers and carriers, and to law enforcement.

(1) Data That Will Be Made Available to the Public

We will release freely to the public data, such as averages, that we determine to pose very low risks to your privacy. In addition to our own analysis, we work with top academics skilled in the field of statistics and computer science to identify any patterns in the data we collect that a third party could exploit in ways to limit your privacy in the raw information. For example, a third party with access to a data you have already provided might compare the location information in the data we collect with other sources of information to try to identify you in our trial. If we identify concerns, we will take steps to address the technical risks by coarsening the time, location or other information, limiting the combinations of information we release, or deleting outright information that poses concerns. We will publicly release the results of this analysis to ensure the quality of our review, together with the measures we took to protect your anonymity. We will never release detailed time and location information publicly.

(2) Data Only Available to Researchers and Carriers Subject to Non-Disclosure Agreements

We may share individual measurement samples with researchers affiliated with accredited research institutions and carriers for the purpose of analyzing broadband performance. This data may contain the information about measurement time and location, or other more detailed information deemed highly useful for research of broadband performance. Researchers and carriers that want to access this data will be required to sign a non-disclosure agreement and agree to other industry standards for safeguarding and appropriate handling personally-identifiable information. (URI in sentence: <link to NDA>)

The agreement prohibits any attempt to reidentify you in the data, limits both the time and specific research purposes of data, and requires disclosures if the data is ever compromised in any way.

(3) As obligated by law

Subject to requests by law enforcement or where otherwise required by law, we may share data with third parties in response to lawful requests for information. The information we are required to share may include your name and contract info, in addition to the mobile broadband performance information we collect in the trial.

[Break to third page]

Our Contractor and other Partners Supporting the Program

The FCC contracts with a broadband measurement company, SamKnows, to conduct the technical functions of the program. Research networks and your carrier also provide support for the program. Information we collect is shared with these parties solely for the purpose of conducting the trial, and only subject to non-disclosure agreements that include strict requirements for safeguarding the data.

Our contractor performs such functions as writing and maintaining the software that performs the measurements, responding to customer service requests, managing your application for the execution of tests, collecting and protecting data gathered in the trial, and analysis and support for the preparation of reports.

Academic research networks operated by Measurement Lab and Level 3 Communications support limited technical functions of the measurement process by providing access to servers on the Internet networks they manage. Measurement Lab collects and discloses the Internet Address of your handset for tests that execute against their network, subject to their privacy policy. (URI <http://www.measurementlab.org/content/privacy-policy-aup>)

Academics supporting our data processing and analysis are provided data for the specific purpose of identifying patterns in the data, and recommending ways of addressing any concerns for your privacy and anonymity.

Other reference materials regarding our privacy policy

[URI links to respective documents]

- Data Usage Summary
- Detailed Testing Architecture and Technical Summary
- Terms and Conditions of Use
- Long Form Privacy Policy Statement
- Program Stakeholders' Code of Conduct